

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

MAGNEQUENCH INTERNATIONAL, INC.,)	
)	
Plaintiff,)	
)	
v.)	C.A. No. 04-135 (GMS)
)	
SONY CORPORATION, SONY CORPORATION)	
OF AMERICA, SONY ELECTRONICS, INC.,)	
ACER INC., ACER AMERICA CORPORATION,)	
ASUSTEK COMPUTER INC., ASUS COMPUTER)	
INTERNATIONAL INC., I/OMAGIC)	
CORPORATION, IOMEGA CORPORATION, LG)	
ELECTRONICS, INC., LG ELECTRONICS USA,)	
INC., LG INNOTEK COMPANY, LTD., LG)	
INNOTEK USA, INC., LITE-ON TECHNOLOGY)	
CORPORATION, LITE-ON TECHNOLOGY)	
INTERNATIONAL, INC., LITE-ON)	
PERIPHERALS, INC., LITE-ON INFORMATION)	
TECHNOLOGY CORPORATION, MEMOREX)	
PRODUCTS (TAIWAN) LTD., MEMOREX)	
PRODUCTS, INC., MICRO-STAR)	
INTERNATIONAL COMPANY, LTD., MSI)	
COMPUTER CORPORATION, MITSUMI)	
ELECTRIC COMPANY, LTD., MITSUMI)	
ELECTRONICS CORPORATION, TEAC)	
CORPORATION, TEAC AMERICA, INC., AND)	
VICTOR COMPANY OF JAPAN, LIMITED,)	
)	
Defendants.)	
)	
)	

**STIPULATION AND [PROPOSED] ORDER DISMISSING THIS ACTION
WITHOUT PREJUDICE AS TO THE DEFENDANTS MEMOREX
PRODUCTS, INC. AND MEMOREX PRODUCTS (TAIWAN), INC.**

IT IS HEREBY STIPULATED AND AGREED by and between plaintiff
Magnequench International, Inc. (“Magnequench”), and defendants, Memorex Products, Inc. and
Memorex Products (Taiwan), Inc. (collectively “Memorex”), by and through their undersigned

counsel of record, that, pursuant to Rule 41 of the Federal Rules of Civil Procedure, this action be and hereby is dismissed in its entirety without prejudice as to Memorex subject to the terms of the March 10, 2005 Settlement Agreement between Magnequench and Memorex ("Settlement Agreement"), and that each party shall bear its own costs and expenses, including attorney fees, incurred in connection with this action. Magnequench's Complaint with regard to the other defendants remains in effect unless and until specifically dismissed.

STIPULATED AND AGREED TO:

June 21, 2005

MORRIS, NICHOLS, ARSHT & TUNNELL

/s/ Mary B. Graham

Mary B. Graham (#2256)
 Karen Jacobs Loudon (#2881)
 1201 N. Market Street
 P.O. Box 1347
 Wilmington, DE 19899
 (302)658-9200

OF COUNSEL:

Brian M. Poissant
 Thomas G. Rowan
 Leo Merken
 JONES DAY
 222 East 41st Street
 New York, NY 10017
 (212)326-3939

*Attorneys for Plaintiff
 Magnequench International, Inc.*

Dated: _____

470916

June 21, 2005

FISH & RICHARDSON, P.C.

/s/ Sean Paul Hayes

Timothy Devlin (#4241)
 Sean Paul Hayes (#4413)
 919 N. Market Street
 Suite 100
 Wilmington, DE 19801
 (302) 652-5070

OF COUNSEL:

Alan D. Smith
 FISH & RICHARDSON, P.C.
 225 Franklin Street
 Boston, MA 02110-2804
 (617) 542-7818

*Attorneys for Defendants
 Memorex Products, Inc. and
 Memorex Products (Taiwan), Inc.*

So Ordered: _____
 United States District Judge